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Attorneys for Plaintiffs
Passages Silver Strand, LLC and
Grasshopper House, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Grasshopper House, LLC, a California
limited liability company doing business as
Passages Malibu, **Passages Silver Strand,**
LLC, a California limited liability company,

Plaintiffs,
vs.

Accelerated Recovery Centers, LLC, a
Georgia limited liability company,
Renaissance Malibu Foundation, a
California non-profit corporation, and
Baldwin Research Institute, Inc., a
New York non-profit corporation,

Defendants.

Civil Case No.: 3:09-CV-778-HA

**Motion for Default Judgment
against defendant Renaissance
Malibu Foundation**

In accordance with Local Rule 7.1(a), the undersigned counsel of record for plaintiffs hereby certifies that he has been unable to confer with defendant Renaissance Malibu Foundation because no communication has been received from said defendant, and the undersigned is not aware of any attorney representing said defendant.

Plaintiffs hereby apply to the Court and move the Court under F.R.Civ.P. 55 for:

- (a) a default judgment in their favor and against defendant Renaissance Malibu Foundation in the amount of \$560,000.00 trebled to \$1,680,000.00.
- (b) a permanent injunction against defendant Renaissance Malibu Foundation and all persons or entities acting in concert with defendant Renaissance Malibu Foundation, prohibiting them from using plaintiffs' trademarks as search engine keywords for pay-per-click advertising and prohibiting them from infringing plaintiffs' trademarks in any other way;
- (c) plaintiffs' reasonable attorney fees; and
- (d) plaintiffs' costs and disbursements herein.

Signed November 3, 2009.

s/ E. J. Simmons

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